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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

UNITED STATES OF AMERICA

3:20-cr-00298-SI

v.

**UNOPPOSED MOTION FOR
PROTECTIVE ORDER PERTAINING
TO DISCOVERY**

EDWARD THOMAS SCHINZING,

Defendant.

The United States of America hereby moves this Court for a protective order pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, seeking to prevent the dissemination or misuse of discovery material containing sensitive information as further described below. Counsel for defendant does not object to this motion. In the interest of providing timely discovery to the defendant, the government respectfully requests that the Court enter the accompanying order.

The discovery material in this case includes highly sensitive information, including personal and financial information such as: dates of birth, addresses, and phone numbers and confidential sources or sources of information. Due to the large volume of discovery material, and the frequency with which the sensitive information appears throughout the documents, redaction of all discovery is not a feasible option.

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In light of the nature of the crimes charged, and the highly sensitive personal and financial information and confidential source information included in the discovery material, the government respectfully requests that the Court order that counsel of record not copy or disseminate, to anyone except members of the defense team and those persons employed by defense counsel who are necessary to assist counsel in preparation for trial or other proceedings, discovery material produced by the government which contains: (a) personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, professional license number, or family members' names ("Personal Information"); (b) financial information of any individual or business, including without limitation, bank account numbers, credit or debit card numbers, account passwords, account names and contact information, account history, account balances, account statements, or taxpayer identification numbers ("Financial Information"); or (c) information regarding the government's confidential sources or sources of information, including criminal histories, arrest records and summaries of information provided to the government ("Confidential Source Information") unless defense counsel first redacts the Personal Information, Financial Information or Confidential Source Information from the discovery material or if the Personal Information or Financial Information is the defendant's own information or the information of a family member.

Given the sensitive nature of the discovery material, the government also moves that the Court order that counsel of record shall not provide copies of the discovery materials to the defendant unless defense counsel first redacts the above-described information from the discovery material. The government further moves that the Court order that counsel of record and defendant not share any discovery material with others not involved in case-related activities.

These restrictions should not hinder the defendant's ability to prepare for trial and will protect others from potential harassment or exposure to misuse of their personal or other information. However, defense counsel should be free to raise any issues regarding this protective order during the course of this litigation should this order impact their representation.

For the foregoing reasons, the government respectfully requests that the Court enter the proposed Protective Order Pertaining to Discovery.

Dated: August 20, 2020

Respectfully submitted,

BILLY J. WILLIAMS
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s/ William M. Narus
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